

E FILED ON 7/14/10
THOMAS E. CROWE, ESQ.
THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION
7381 W. Charleston Blvd.
Suite 110
Las Vegas, Nevada 89117
(702) 794-0373
Attorney for Debtor
Nevada State Bar no. 3048

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

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In re:)	BANKRUPTCY NUMBER:
)	BK-S-09-30390-LBR
ALMA DECASTRO,)	Chapter 13
)	
Debtor.)	
)	Date: 8/23/10
_____)	Time: 10:30 a.m.

**OPPOSITION TO MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

Comes now, Debtor, by and through her attorney, THOMAS E. CROWE, ESQ., and opposes Wachovia Mortgage's Motion to terminate the Automatic Stay. Said opposition is made and based upon the Points and Authorities attached hereto, the pleadings and papers on file herein and oral argument at the time of hearing of this matter.

DATED this 14th day of July, 2010.

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION
By /s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
7381 W. Charleston Blvd.
Suite 110
Las Vegas, Nevada 89117
Attorney for Debtor

POINTS AND AUTHORITIES

Debtor filed for relief under Chapter 13 on or about October 28, 2009. The Debtor herein opposes the Motion for Relief from Automatic Stay filed herein by WACHOVIA MORTGAGE CORPORATION, by and through its attorney, GREGORY L. WILDE, ESQ., based upon the following points.

The Debtor requests mortgage loan modification mediation.

Therefore, Debtor respectfully requests that the Motion For Relief From the Automatic Stay be denied.

DATED this 14th day of July, 2010.

Respectfully Submitted,

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

/s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
Nevada State Bar No. 3048
7381 W. Charleston Blvd.
Suite 110
Las Vegas, NV 89117
Attorney for Debtor

CERTIFICATE OF MAILING OF RE: OPPOSITION TO MOTION FOR RELIEF
FROM AUTOMATIC STAY

I, PAMELA POULSEN, hereby certify that a copy of the OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY filed herein, in the above-entitled case, was mailed by me on the 14th day of July, 2010, by depositing copies thereof in a sealed envelope, first-class postage prepaid, in the United States Mail, to the parties and addresses as follows:

Gregory L. Wilde, Esq.
208 S. Jones Blvd.
Las Vegas, NV 89107

Mark S. Bosco, Esq.
2525 East Camelback Road
Suite 300
Phoenix, AZ 85016

Rick Yarnall
Chapter 13 Trustee
701 Bridger Ave., #820
Las Vegas, NV 89101

DATED this 10th day of September, 2009.

/s/ PAMELA POULSEN
PAMELA POULSEN, an employee of
THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

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